

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA,)	Criminal No. 2:19-cr-00441-RMG
)	
Plaintiff,)	
)	
vs.)	DEFENDANT’S
)	MOTION TO EXTEND DEADLINE
AMIR GOLESTAN AND MICFO, LLC,)	FOR OBJECTIONS TO REVISED
)	PRESENTENCE REPORT
Defendants.)	
)	

Comes now counsel for the Defendant, Amir Golestan, and moves for permission to extend the deadline for objections to the Revised Presentence Report (“RPSR”) from the current October 19, 2022 to December 1, 2022. In support of this Motion to Extend, counsel states the following grounds:

1. Lead counsel for Mr. Golestan anticipates the objections to be extensive and would like additional time to meet with Mr. Golestan, who is currently incarcerated at the Charleston County Detention Center (“CCDC”), to discuss and formulate the objections. Mr. Golestan’s current incarceration requires counsel to schedule in-person visits to CCDC to adequately review the RPSR which creates certain logistical issues thus the need for additional time to file objections to the RPSR.

2. Lead counsel for Mr. Golestan is currently scheduled for a two-week long jury trial in an unrelated criminal matter beginning Monday, November 7, 2022 through November 18, 2022. An extension of the current deadline to file objections to the RPSR from October 19, 2022 to December 1, 2022 would allow counsel to adequately prepare for trial as well as allow counsel sufficient time to confer with Mr. Golestan, review the RPSR, and formulate any objections.

The undersigned is informed that the Government has no objection to the proposed extension.

WHEREFORE, the Defendant, Amir Golestan, respectfully requests that this Court enter an Order extending the current October 19, 2022 deadline for objections to the RPSR to December 1, 2022.

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